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ABSTRACT

States were surveyed to determine the state agencies handling grievances regarding postsecondary educational institutions, the nature and resolution of grievances, and how agencies communicate. The analysis was based on usable returns from 53 individuals representing 38 states. The most frequently mentioned agency handling any postsecondary educational grievance was the Veterans Approval Agency, with the Attorney General's Office also frequently mentioned. Several states had agencies that handle grievances that did not seem to fit in any of the given categories and were consequently counted as "other." There was evidence that many agencies handle grievances without having authority for complete followthrough by initiating redress procedures. The majority mentioned. of complaints received by 40 reporting agencies came from students or parents: 27 agencies received complaints from this source regularly or frequently and 14 agencies occasionally or rarely. The majority of complaints had to do with refund policies. Complaints dealing with instructional programs or recruitment and admissions practices were also common. For 1,788 grievances reported by 39 agencies, 68 percent were resolved out of court in favor of the consumer. The problem mentioned most frequently by agencies was inadequate laws, policies, or staff for implementation of the redress process. Forty-four percent of respondents indicated that they had no problems. Perceived needs for information on grievance procedures from other states as well as information that might be shared with other states were also surveyed. A directory of state agencies and contacts and references are appended. (SW)

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COMMUNICATION AND THE REDRESS OF GRIEVANCES

THE FLORIDA BOARD OF INDEPENDENT COLLEGES AND UNIVERSITIES
and
THE STATE AND REGIONAL HIGHER EDUCATION CENTER
of the
FLORIDA STATE UNIVERSITY

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U.S. DEPARTMENT OF EDUCATION
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SHEEO

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INTRODUCTION

A multitude of complex problems beset state policy makers and state officials responsible for approving programs and licensing institutions at the postsecondary level. This research concentrates on one area of concern, the intrastate and interstate mechanisms for communication utilized by state officials, and surveys the present system.

During the past fifteen years, tremendous strides have been made by the states in enacting suitable legislation relating to nonpublic colleges. In 1960, Robert H. Reid authored a study sponsored by the American Council on Education which indicated that twenty-six states had no legal control over degree-granting institutions.[1] By 1974, thirty-six states had extended controls to degree-granting institutions, though numerous exemptions did exist.[2] Also, by 1974, the Education Commission of the States Task Force had written its model legislation[3] and co-sponsored two conferences on consumer protection in postsecondary education.[4] Yet, in the same year, articles in the Boston Globe,[5] Washington Post,[6] and American Education[7] focused attention on serious consumer issues relating to educational programs and institutions.

On the national level, while the National Association of State Approving AGencies, and the National Association of State Administrators and Supervisors of Private Schools do

exist, both are relatively new organizations. Those state officials charged with administering laws pertaining to licensing private degree-granting institutions met for the first time at the Airlie Conference in 1975.[8] Thus, the relative newness of some state laws, and the national groups, as well as the multiplicity of state agencies (Appendix A provides a working list of state officials concerned with licensing, approving, and consumer questions in postsecondary education) serve to complicate the issue of communication.

BACKGROUND INFORMATION

Paul W. Howerton noted in 1963 that

> No action by any living organism takes place without some form of information processing. The storage of past experience, and the acquisition of new experience involves the handling of information of all kinds.[9]

This is even more true in 1976. Now, for example, there exist over one-hundred data bases and several sophisticated on-line search systems to provide access to much of the important data and literature of the world.

The National Center for Education Statistics (NCES) has an excellent example of a computer-based data delivery system in EDSTAT II which provides on-line information retrieval capabilities anywhere in the United States for a nominal charge. Among the available files are the Higher Education General Information Survey (HEGIS) and the Post-secondary Vocational Education Directory. Additional services of NCES are described by William Dorfman[10] and other data sources of possible interest are detailed by Katherine Allman.[11]

The Western Interstate Commission for Higher Education's National Center for Higher Education Management Systems (WICHE's NCHEMS) among other projects is working on standardized definitions and procedures for aggregating

and analyzing data elements. The management information system communication base which will be developed will eventually serve as a linking mechanism between levels of decision making in higher education from academic departments within local institutions to federal and other agencies on the national level.[12]

West Publishing Company is an example of a commercial organization which has moved into the on-line data base service. Of course, there are other appropriate examples on the national level such as Educational Resources Information Center (ERIC) and the National Technical Information Service (NTIS) which has gone one step further than ERIC and provides selective dissemination of microfiche. NEXUS, sponsored by the American Association of Higher Education, began its people to people referrals in 1974. On the state level many agencies concerned with licensure and approval publish lists annually of schools approved and disapproved and those not eligible for approval or disapproval. The Bell proposed Postsecondary Education Consumer Protection Act (HR2786, 94th Congress, first session) calls for a similar list showing changes in approval or accredited status to be published biannually in the Federal Register.

It is not always possible to draw a fine line between data and document delivery systems. The familiar library is one type of information system usually associated with document retrieval; however, many provide data retrieval as well. Since World War II, other systems of information service have evolved (information analysis centers, information centers, referral centers, clearinghouses) which further blurr distinctions.

According to Herman Weiseman , a clearinghouse is a documentation center (storehouse/depository for documents) with the additional mission of serving as a central agency for collection, classification, and distribution of information. A clearinghouse would also include such functions as collecting and maintaing records of research and development and refer questions about these records to the source[13].

There have been several calls for a national clearinghouse for information pertaining to postsecondary education which would assist those concerned with licensure, approval and accreditation on several levels, i.e., documents, data, and referral on a local, state, and national basis.

The first Conference on Consumer Protection recommended:

> That the Education Commission of the States serve as a catalyst for the development of a clearinghouse of information, which in effect would be a data bank of information on all postsecondary education programs.[14]

The first Conference recognized that a great deal of the information already existed; however, it did not exist in a comprehensive single source. The information clearinghouse data bank would enable students, prospective students, counselors and others to make informed judgments regarding selection of institutions; however, the essential purpose of the clearinghouse would be to improve communication between consumer organizations and education groups.[15] The second Conference on Consumer Protection also recommended clearinghouses and the various seminars detailed the data that should be included.[16]

Both Orlans, et al.[17] and the National Advisory Council on Education Professions Development[18] recount instances where the loss of state licensure or accredited status did not result in a loss of institutional eligibility for federal financial assistance. Indicating it would be easy to present evidence of malpractice in the proprietary school field, the Orlans report recounts recent cases of fraud involving regionally accredited institutions.[19] There are also cases where schools have had their accreditation revoked and the state license (or exemption from licensing)

continued.[20] A clearinghouse which provides up-to-date information on the status of institutions would be of assistance here.

The Federal Interagency Committee on Education (FICE) has also echoed the need for a data bank, exchange of information among those involved in consumer protection in education, and recommended that a federal center for consumer complaints about education be established.[21] The FICE report even includes two draft forms for the registering of consumer grievances; the more complex draft (B) requires the student to mail their complaint to the appropriate agency (one or more of seven federal agencies, including the recommended central agency; one or more of four types of regional, state or local offices; one or more of four types of private consumer organizations). Students with grievances are advised that if these agencies are not sufficient they could also write their State Representatives or U.S. Senators and Congressmen.[22] The Federal Trade Commission offers similar advise and channels for consumers and notes that ". . .if all else fails, you can sue the school."[23] The problem of multiple agencies and the redress of grievances will be further discussed in the next section.

It should be emphasized that while the call for a clearinghouse has been made by several authoritative sources,

one has not been created and the need still exists. The lag in establishing a clearinghouse is perhaps less attributable to the problem of deciding what data to be included than the problem of deciding who should do it and more to the point, who should fund it.

There are two levels of concern regarding the educational consumer: 1) the direct consumer or student; and 2) the indirect consumer or society in general. On level one, we see why degree mills and other postsecondary institutions of questionable quality have persisted, if not thrived, in the United States. Some of the more naive degree seekers (especially those from foreign countries) do not know they have been deceived or are ashamed to acknowledge their foolishness and lack of foresight. Other graduates of the mill operations know full well they are purchasing a diploma. When the latter group succeeds in deceiving employers, customers, clients or patients, they enter the second level of concern since innocent consumers and society in general become involved. The problem of level two and the innocents on level one have been addressed in the Education Commission of the States' Model State Legislation. Section 13 specifically provides for an agency or commission which consumers with a complaint can file for redress of that grievance. After investigating the complaint, the agency or commission may pass judgment on award of relief or restitution. The agency or commission

may also serve an order requiring cease and desist, impose penalties or revoke authorization to operate or an agent's permit. Section 14 allows judicial review of agency or commission actions and/or judgments.[24]

Certainly the system of postsecondary education is complex and often bewildering from the educational consumers point of view. Since a majority of the states now have developed legal responsibility and procedures for controlling fraudulent practices in postsecondary educational institutions (several based upon the Education Commission of the States' Model Legislation), it was felt that a questionnaire survey might be appropriate. If the results of the survey could identify the state agencies involved in the redress of grievances of postsecondary education consumers, describe the procedures used, and detail problems encountered from an agency viewpoint it would have some implications for general interstate and intrastate communications as well.

PROCEDURES

A questionnaire was developed, pretested, and mailed in mid-May to 117 individuals who had been previously identified as involved in licensure or approval of post-secondary educational institutions and programs at the state level. The early replies indicated that responses from the Attorney General's Office (especially the Division of Consumer Fraud) would also be of value. Accordingly fifty-one additional questionnaires (including all states and the District of Columbia) were mailed on June 5, 1976. Three additional questionnaires were mailed to individuals subsequently identified, bringing the total population to 171 individuals and the fifty states and the District of Columbia (hereafter referred to as the fifty-one states or states).

Before July 1, 1976, the preconference publication deadline date, responses were received from sixty-eight individuals (40%) representing forty-one states (80%). The returns include responses from agencies concerned with veterans education approval, proprietary or vocational licensing and degre-granting institutions. The agencies responding have been indicated with an asterisk in Appendix A. The analysis which follows is generally based upon usable returns from fifty-three individuals representing thirty-eight states (75%).

ANALYSIS

Agencies

The cumulative reponses for all types of agencies identified as handling grievances regarding postsecondary educational institutions are given in Table I.

TABLE I

STATE AGENCIES HANDLING GRIEVANCE REGARDING POSTSECONDARY EDUCATIONAL INSTITUTIONS

Agency	Any Grievance		Grievances Involving Profit Degree-Granting Institutions	
	# of Agency Reponses	# of States	# of Agency Reponses	# of States
Higher Education	32	24	8	7
Attorney general	40	27	15	14
Independent agency/ board	16	12	10	9
Governor's office	11	10	1	1
Vocational education	25	20	8	5
Veterans approval	46	35	17	16
Consumer protection	24	20	10	8
1202 commission	6	6	4	4
Other	7	7	2	2

Of the eleven states which had more than one usable return, different answers were received from ten agencies (91%). The difference might have been 100%, except that one state showed real cooperation/communication when two separate agencies wrote their answers on the same questionnaire.

The most frequently mentioned agency handling any postsecondary educational grievance was the Veterans Approval Agency with forty-six responses representing thirty-five states. It should be noted that while every state does have a State Approving Agency, in some states this is not a separate agency. The other frequently mentioned agency for handling grievances was the Attorney General's Office with forty responses representing twenty-seven states.

Some comment should be made regarding the large number of responses in the "other agency" category in Table I. Several states have agencies which handle grievances which did not seem to fit in any of the given categories and were consequently counted as "other," such as State Ombudsman, Department of Business Regulations, Department of Public Safety, Student Financial Assistance Services, and Regional Office of the Better Business Bureau.

Many states did not respond to the question of which agency or agencies were designated to handle grievances regarding profit degree-granting institutions and two states specifically commented that no agency was designated. The Veterans Approval Agency and the Attorney General's Office were the most frequently mentioned agencies for handling grievances regarding profit degree-granting institutions.

The problem of multiple agencies if further illustrated by the fact that some agencies which handle complaints do not have a legal authority to do so and many do not have a legal responsibility which would include initiating redress procedures. When asked to indicate the specific legal authority for handling grievance, complaint or redress procedures, forty reponsdents (75%) cited state statutes or state rules and regulations; two respondents (4%) mentioned rules of the consumer protection agency; two (4%) mentioned rules of the attorney general; six (11%) mentioned annual contract with the Veterans Administration, Veterans Administration Regulations or U.S. Code Title 30; and three respondents (6%) specifically mentioned that they had no clear authority to handle complaints at all!

Thirty-three respondents from nineteen different states indicated in an open-ended question that agencies concerned with veterans education approval, proprietary,

or vocational licensing had specific legal authority which would include initiating redress procedures. Two respondents,representing states with consolidated boards indicated that they had the ability to initiate redress procedures. Eight respondents representing eight different states, indicated the agencies concerned with private and/or public degree-granting institutions had a legal responsibility which would include initiating redress procedures.

Another frequently identified agency was the Attorney General (twenty-six respondents; twenty-two states); one respondent further commented that any prosecuting attorney in any of the nineteen districts of that state may initiate redress procedures. In many states the consumer protection agency and the Attorney General are one and the same; however, eight respondents in eight states indicated that a separate consumer protection agency may initiate redress. This agency may be located within other state agencies such as the Department of Commerce, the Department of Business Regulations or the Department of Agriculture. Three respondents indicated that no agency existed which had a legal responsibility which would include initiating redress procedures and one respondent "didn't know, not applicable to SAA."

The fact that the open-ended responses do not exactly parallel those given in Table I further indicates the fact that many agencies handle grievances without having authority for complete follow-through by initiating redress procedures.

An illustration of the intrastate communication problem is the letter response from one state's 1202 Commission (which was not counted as a usable return) stating:

> . . .does not have a state agency specifically designed to handle the redress of postsecondary educational grievances. This procedure is handled at the institutional level.

Also in that same state, the agencies concerned with private vocational schools and veterans education reported in its questionnaire (counted as a usable return) that while there was no specific legal authority for grievance complaint or redress procedures, they had settled twenty-two grievances out of court in favor of the consumer; resolved four others out of court in favor of the institution; had two grievances pending in court; and had had two complaints withdrawn. It was further reported that:

> Any complaints on postsecondary private vocational schools which could not be resolved by our Office are referred to the Attorney General's Office for possible action.

If the various state-level agencies cannot agree on which agencies, imagine the dilemma of the consumer! Mechanisms for communication will be discussed next, followed by a section with statistics that indicate over 2000 consumers have found a state agency to handle their complaint.

How Do The Agencies Communicate?

As mentioned in the previous section, no state identified a single agency when asked to indicate state level agencies which handle grievances regarding postsecondary educational institutions. Since multiple agencies are involved, the next logical question concerns what mechanisms these agencies have to coordinate with one another.

The responses to an open-ended question ranged from "none" to "a contact or more each week." Most agencies have informal coordination in person or via telephone calls, letters, and copies of correspondence. In general the complaints are fowarded to the appropriate office which resolves the complaint unless legal services is necessary, at which point a formal request is made to the Attorney General for further action.

The most disheartening comments were from seven respondents (14% of the fifty-two respondents answering the question) who felt they had no formal or informal mechanism for coordination.

Specific comments illustrating the responses are as follows:

> None, if any coordination, it is coincidental.
>
> Technically we have a formal mechanism with the Attorney General's Office if the college offers a degree without submitting requirements to the Commission. Informally, the Better Business Bureau will contact us, likewise the State Approving Agency and vice-versa.
>
> The Commission is the point of first appeal. After the Commission's action, the plaintiff may elect to go to court for relief.

The Grievances--How Many, By Whom, About What, How Resolved

Forty respondents had statistics available on the number of grievances received by their agency. One of the forty responses had to be discarded as an extreme value since that state agency handled 1500 grievances in the previous twelve month period involving seventy-five institutions; 375 grievances (25%) were settled out of court in favor of the consumer; 150 grievances (10%) were resolved out of court in favor of the institution; and 975 grievances (65%) were referred to the State Attorney General.

Among the other thirty-nine respondents, 2146 grievances were received during the previous twelve month period involving 530 institutions. The average was fifty-five grievances per respondent involving fourteen institutions. Of the reported grievances and institutions, those agencies

concerned with veterans education approval, proprietary or vocational licensing handled 1530 grievances (71% of all reported grievances involving 285 institutions.)

Table II indicates the type of institution involved in the 2146 grievances received by the forty agencies responding by cumulative rank order reportings. The "other" category included additional write-in institutions, such as "degree-selling," "regionally accredited out-of-state," "NATTS," "ICS," and "correspondence schools."

TABLE II

TYPE OF INSTITUTION INVOLVED IN GRIEVANCES

Type of Institution	Number of Reportings
Profit non-degree granting	32
Profit degree-granting	18
Non-profit non-degree granting	15
Regionally accredited degree-granting	13
Other non-profit degree-granting	13
Other	5

The majority of the complaints received by forty reporting agencies came from students or parents: twenty-seven agencies received complaints from this source regularly or frequently (50-100% of the time) and fourteen agencies occassionally or rarely. Table III indicates

the number of times a particular sources was reported in rank order.

TABLE III

SOURCE OF COMPLAINTS

Source	Number of Rerportings
Student or parents	41
Consumer protection agency in own state	34
Other state agencies in own state	33
Lawyers for students	31
Veterans approval agency	30
Postsecondary institutions	27
State level agencies in other states	25
Better Business Bureau	25
U.S. Office of Education	23
Regional accrediting agencies	22
Others (FTC, FAA, NATTS, AICS, NHSC, Congress)	19

The majority of the complaints have to do with refund policies. As indicated in Table IV complaints dealing with instructional programs or recruitment and admissions practices were also common. Twenty-two agencies reported

receiving complaints as to refund policies regularly or frequently (50-100% of the time); ten agencies reported receiving complaints as to instructional programs regularly or frequently and fifteen receive them occassionally; six agencies reported receiving complaints concerning recruitment and admissions regularly or frequently and fourteen receive them occassionally.

TABLE IV

NATURE OF COMPLAINTS

Complaint	Number of Reportings
Refund policies	38
Instructional program	37
Recruitment and admissions	36
Instructional staff	34
Advertising	32
Instructional facilities/ equipment	31
Job placement	31
Representation of charter, approval or accredited status	28
Fiscal instability	24
Grading	22
Housing	21
Other (bond claims; personnel problems between school employees, etc.; policies relating to resident and non-resident tuition rates)	6

Of the 2146 previously mentioned grievances reported by thirty-nine agencies, further information as to the resolution of 1788 of them is know. As shown in Table V, 1280 grievances (68%) were resolved out of court in favor of the consumer, indicating that once they get to an appropriate agency, the consumer does get assistance.

TABLE V

RESOLUTION OF GRIEVANCES

	#	%
Out-of-Court in Favor of Consumer	1210	67
In-Court in Favor of Consumer	11	1
Out-of-Court in Favor of Institution	596	33
In-Court in Favor of Institution	6	1
Referred to Attorney General or Lawyers	12	1
Pending or Resolution Unknown	102	6

Some states had newly established agencies who could not always provide complete statistics. Other states were concerned with the definition of grievance vs. complaint. These viewpoints are further clarified by the following comments:

> This agency is not yet a year old; therefore, the responses herein are not based on broad experience with consumer complaints. However, our system seems to work fine based on the few complaints we have received.
>
> As a coordinating agency, we generally receive complaints rather than grievances. Many of these are the "Why did my daughter not get admitted to University X. . ." type. Our role is to assist people to clarify the matter, but if there is a very real problem, it is a matter between the institution and the individual. Further, we do not have any authority over private institutions other than confering the authority to grant degree.

The last comment touches on one of the problem areas which was identified by the agencies and will be discussed next.

POINTS FOR DISCUSSION AND SUMMARY

In an open-ended question, agencies were asked to indicate any problem areas confronting their State in its redress of grievances regarding postsecondary educational institutions. The problem mentioned most frequently (nineteen of the twenty-nine respondents or 65%) was inadequate laws, policies or staff for implementation of redress process. Many of the respondents indicated they had no problems (twelve or 44%). Eight found dealing with out-of-state/multi-state institutions a problem.

The range of problems mentioned is somewhat indicated by the following comments:

> Only one agency has a legal responsibility for a part of postsecondary education while another part goes unregulated.
>
> The State cannot initiate litigation on behalf of an individual.
>
> Violation is just a misdemeanor so it is difficult to prosecute if parties involved have left the state.
>
> Need for interim punitive measures short of revocation.
>
> Little or no jurisdiction over out-of-state institutions with extensions in this State.
>
> Lack of certainty as to steps to be taken by a complaint.
>
> Lack of full-time legal counsel.

Absence of a policy.

Too much fraud. Too few resources to combat it.

1) prerequisites for enrollment; 2) refund policy; 3) determining date of termination; 4) time delay in obtaining correction of items of non-compliance.

So far our laws seem fairly adequate.

Investments of students are not sufficient in amount to employ legal assistance. If case cannot be resolved by the vocational education staff or Attorney General's Office, the student is the looser.

The agencies were asked to indicate in two open-ended questions (1) what information they had for grievance procedures that would assist other agencies; and (2) what information from other states on the redress of grievances regarding postsecondary education institutions would be of assistance to them. Sixteen respondents (59% of the twenty-seven answering the question) indicated that they had no materials to assist other states; seven respondents mentioned their annual reports; one respondent mentioned case studies; and one respondent briefly summarized his procedure.

Four individuals did not feel that there was any information on the redress of grievances regarding post-secondary educational institutions in other states that would be of assistance to them at the present time. Six mentioned exchange of information concerning schools or individuals that have been found in violation; twenty-two (63%) mentioned

other types of information exchange, such as how private vocation schools operating through the mails are regulated, how complaints are processed, what controls other states have found to be successful, precedents established through policy or law, pertinent information relative to home study schools, and case studies. Three respondents were not sure what information was available from other states.

There appears to be a real need for information exchange as indicated by the following additionally illustrative comments:

> Agencies involved and the procedures followed; also the legal basis for such actions.
>
> We have already made use of the materials from PECA (IEL) Conference for State Licensing Officials, Airlie, July, 1975. New materials would be welcomed.
>
> 1) Penalties; 2) methods of investigation and enforcement; 3) possible procedures for compensation to consumer for fraud.
>
> Would like to know the registration agencies having authority similar to our own in other states.
>
> Information on scope, systems, processes, and procedures of other states so that they can be reviewed for possible adoption in this state.
>
> Particularly interested in redress of grievances as they relate to public degree-granting institutions, if done by a state agency.
>
> I am not aware of formalized procedures in other states. Knoledge of the existence of such procedures and of the procedures themselves would be desirable.

Virginia Knauer's lament at the Second Conference on Consumer Protection seems particularly appropriate at this point: "Where can the education consumer turn for help?. . .The answer is everyone and therefore no one."[25] She went on to note that, "we need to develop mechanisms for using consumer complaints, as research and enforcement tools so that the bad experience of one student can be used to protect the next student."[26]

It has been proposed that the establishment of a clearinghouse would improve the situation. Among the questions to be answered are: what data should be included; how will the data be collected and processed; who will do it?

Footnotes

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[14] Education Commission of the States, Report of the National Invitational Conference on Consumer Protection in Postsecondary Education, p. 3.

[15] Ibid.

[16] Education Commission of the States, Consumer Protection in Postsecondary Education, p. 4.

[17] Harold Orlans, et al., Private Accreditation and Public Eligibility, 2 vols. (Washington, D.C.: Brooklings Institution, October, 1974) ERIC Document Reproduction Service ED 097 858

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on Institutional Licensing (Washington, D.C.: National Advisory Council on Education Professions Development Act, April 1975)

19 Orlans, et al., pp. 314-315.

20 National Advisory Council. . ., p. 14.

21 Federal Interagency Committee on Education, Subcommittee on Educational Consumer Protection, Toward a Federal Strategy for Protection of the Consumer of Education (Washington, D.C.: U.S. Department of Health, Education, and Welfare, 1975)

22 Ibid., pp. 67-70

23 U.S. Congress, House of Representatives, Subcommittee of the Committee on Government Operations, Proprietary Vocational Schools, Hearings Before Subcommittee of the Committee on Government Operations, Ninety-third Congress, Second Session, July 16, 17, 24, and 25, 1974. (Washington, D.C., U.S. Government Printing Office, 1974) p. 40.

24 Education Commission of the States, Model State Legislation, pp. 25-29.

25 Virginia H. Knauer, "The Consumer's Need for Protection in the Educational Marketplace" in Education Commisssion

of the States, Consumer Protection in Postsecondary Education, p. 13.

[26] Ibid.

APPENDIX A

DIRECTORY OF STATE AGENCIES AND CONTACTS POSTSECONDARY EDUCATIONAL INSTITUTIONS REDRESS OF CONSUMERS' GRIEVANCES

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